Merritt Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
Merritt Forest District
PO Box 4400, Stn. Main
Highway 5A & Airport Rd.
Merritt, BC
V1K 1B8

October 4, 2001

This is a summary of the public input received on the Timber Supply Review in the Merritt Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Merritt Timber Supply Area

Background

As part of the review of timber supply in the Merritt Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Merritt Timber Supply Area *Data Package* and the *Information Report* in September 1999. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Merritt TSA. A 30-day review period, ending October 12, 1999, was provided for the public to comment on these documents.

On March 8, 2001, the British Columbia Forest Service released the *2001 Merritt Timber Supply Area Analysis Report* and the *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended May 7, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Merritt TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Merritt Forest District office.

Public Review Process and Response

Merritt District staff actively solicited public input on the Timber Supply Review in the Merritt TSA through the following actions:

- approximately 60 copies of the *Information Report, Data Package and Analysis Report* were mailed to stakeholders in the TSA, such as First Nations, licensees and local governments. Meetings or presentations were offered.
- the *Data Package and Analysis Report* were available at the district office in Merritt and the regional office in Kamloops; approximately 23 were picked up.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- copies of all the documents were made available to the local media. Interviews were conducted with both radio and newspaper.
- open houses on the *Data Package* were held in Merritt and Princeton during September, 1999.
- open houses on the *Analysis Report* were held in Merritt on March 28, 2001 (participants) and in Princeton on March 29, 2001 (22 participants).
- presentations on the *Analysis Report* were made to the Merritt TSA Planning Committee, Merritt City Council, Princeton Town Council, Nicola Tribal Association and the Upper Similkameen Band during March and April, 2001.

The Merritt Forest District received two written submissions on the *Data Package* and five submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Merritt TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments.

Data Package

Land Base Factors

The submission from the Ministry of Environment, Lands and Parks (MELP) expresses support for the use of operability lines given the dependence of biodiversity protection on inoperable sites but asks how this will be tracked in future forest planning.

MELP says they are pleased to see recognition of the significant road developments in this TSA and hope that licensee concerns with the netdowns for roads, trails and landings can be addressed in the future through road rehabilitation planning.

The joint submission from the licensees questions the definitions used for problem forest types. In particular, the licensees say Douglas-fir stands shorter than 19.5 metres are not being harvested and should be defined as problem forest types.

MELP says potential protected areas should be excluded from harvesting for a sensitivity analysis since these areas are currently avoided. The licensees say potential protected areas should not be considered in this timber supply analysis, as the impacts of these areas are considered when they are legally established.

The licensees express concern about double-counting in environmentally sensitive areas (ESAs). For example, they say recreation ESAs within lakeshore riparian management zones, wildlife ESAs within ungulate winter range areas, and water ESAs within community watersheds should not be netted out of the land base.

Volume Estimates and Rate of Growth

MELP says they support modelling the exclusion of Douglas-fir volumes in mixed species stands. The agency says measures to protect old growth, watersheds and biodiversity all employ fir retention strategies to various degrees and it is critical that this be modelled in the timber supply analysis.

The licensees say the 15 m^3/hectare volume exclusion for Douglas-fir estimates historic retention levels. They say this is no longer current practice and should be not be included in the analysis. According to the licensees, the current policy is to retain five of the largest trees with wildlife attributes per hectare, which are to be considered as wildlife trees.

The licensees note that the minimum harvestable age is based on the age at which a stand achieves a merchantable volume (150 m^3/hectare) and district cutting priorities have nothing to do with setting this age.

Silviculture and Regeneration

The licensees maintain that dry-belt Douglas-fir is almost entirely harvested by a selection method, and this should be modelled in the analysis. The use of small patch systems should not be modelled.

The licensees say the current experience of two smallwood licensees is that establishment density for these types is 1000-1300 stems/hectare and this figure should be used in the analysis.

Biodiversity

The licensees note that landscape-level biodiversity requirements are not being applied as current practice but are being included in the base case on the direction of the chief forester.

The licensees say that wildlife tree patches (WTPs) should be modelled as area netdowns, rather than volume reductions. They say the estimate of 10.7% of the cutblock in WTPs appears high based on current practice and the fact that some WTPs are located outside the timber harvesting land base or in other constrained areas (e.g., riparian reserves).

Visual Quality

The licensees say that only areas formally designated by the district manager as scenic areas with established visual quality objectives should be considered in the analysis. They note the forest cover requirements for visually sensitive areas appear to reflect future trends but not current practice.

Riparian Management

MELP expresses support for the measures to protect riparian areas, particularly the model developed for wetland buffers. They note the importance of these buffers (even if not required by the Forest Practices Code), particularly for the management of moose. The agency says the timber supply analysis should reflect that many smaller wetlands occur as part of complexes that do have Code buffers and it is current practice to retain buffers.

The licensees' submission raises a number of issues with regard to riparian area management. These include:

- the assumptions for small streams and for wetlands do not reflect current practice.
- the licensees are unsure if the stream classification system from the sample watershed is thorough enough to distinguish fish-bearing from non-fish-bearing small streams. Current practice is to classify all affected streams based on a fish inventory prior to finalizing harvesting plans.
- the retention levels for lakes imply these are permanently reserved, which is inconsistent with visual quality management and the *Kamloops Region Lakeshore Management Guidebook*.

Elk Corridors

The licensees say they are not aware of any policy definition of Elk Movement Corridors and the forest cover requirements associated with them should be eliminated from the analysis.

Timber Supply Area Analysis Report

Land Base Factors

The submission from the director of the Shuswap Environmental Action Society (SEAS) says he assumes that previously designated inoperable areas have been included into the operable land base for this analysis. The submission says the analysis does not account for the extraordinary measures required to meet requirements for riparian areas, wildlife trees or slope stability in these areas with poor quality wood and/or very steep slopes.

The licensees' joint submission says that just because problem forest type stands have a silviculture label assigned to them, that does not mean they should be considered available for future harvesting. This should only occur when there is a rehabilitation program in place or surveys show the current forest cover will yield a merchantable crop, according to the licensees.

Grizzly Bears

The licensees note the draft grizzly bear recovery plan has not been approved and should not be considered in the timber supply analysis.

Merritt Timber Supply Area

Riparian Area Management

The Department of Fisheries and Oceans (DFO) expresses concern that the netdown for riparian areas is insufficient. The agency says DFO and MELP have identified the need for increased riparian retention within the Nicola River watershed. The submission notes that a 1998 strategic review of fisheries resources in the Thompson/Nicola drainages identified high values and the need to manage watersheds for hydrological stability through maintenance of water quantity and quality and riparian protection.

DFO says recommendations were made to the deputy minister of forests for interim standards for small streams that are directly tributary to fish-bearing streams. DFO also notes that streams in the Nicola River watershed have been declared temperature-sensitive and licensees were requested in January 2000 to manage for shade on fish-bearing streams in that watershed.

The licensees say the estimate of reserve/management zones for streams should be a priority for measurement before the next Timber Supply Review.

Stand Level Biodiversity

The MELP submission questions the reduction in the area retention levels for WTPs based on expected landscape unit objectives. The submission says since Old Growth Management Areas are still being developed, they are not current practice, and this reduction is not appropriate until they are finalized. As well, MELP says it is their experience that almost no individual trees are retained as wildlife trees, contrary to the assumption made in the *Analysis Report*.

The licensees maintain that the starting estimate of 10.7% average retention per cutblock for WTPs is high, particularly when current subzone targets are considered.

The MELP submission asks the chief forester to consider an amount of wood to be assigned for coarse wood debris (CWD), and suggests 10 m^3/hectare. The agency says there must be some sound wood to meet CWD requirements; retaining only wood so rotten it cannot be milled is not sufficient. The submission also identifies a need to get around the circular argument that the Timber Supply Review only models current practice and current practice cannot be changed because it was not modelled in the Timber Supply Review.

Landscape Level Biodiversity

The licensees say the assumption that all stands outside the timber harvesting land base (non-THLB stands) continue to age with no disturbance impacts is not valid, or current stands would be 10,000 years old. They suggest a more realistic alternative to modelling the impact of 400 hectares of disturbance in the non-THLB annually would be to assume that the current age class distribution represents the expected distribution over time, and run a sensitivity analysis on this basis.

In its submission, MELP questions whether the chief forester intended to delay meeting old-growth retention requirements until the third rotation only if there was a demonstrated impact on timber supply, rather than as a default.

The SEAS submission notes potential problems in present and future stands (e.g., long range forecasts for losses from fire and insect damage) that should be factored into the maximum allowable disturbance levels. With regard to recruiting old growth to meet retention requirements, the society says this should not take place solely outside the THLB first since the same forest disasters occur in and outside the THLB. This submission also says the age class profile should not be allowed to drop off so dramatically after 100 to 150 years for the same reason (future uncertainty about potential losses).

Forest-to-Grassland Reversion

The licensees say that since there are no defined objectives or programs for grassland expansion, this is not current management and should not be part of this timber supply analysis.

Harvest Sequence

The MELP submission notes a significant planning challenge that results from major licensees targeting smallwood stands as leave areas, while smallwood operators target parts of the normal forest for leave areas. The agency says there is potentially an availability problem for both types of operations.

Other Comments

Several submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

Three submissions comment on the Timber Supply Review process.

MELP says they would like to reach an agreement to ensure the sensitivity analyses they requested are done, and that changes proposed to the *Data Package* are made available to MELP.

The licensees note an error in the socio-economic analysis section. The statement that Riverside is "partially owned by Tolko Industries" is not correct, according to the licensees, who also say ownership is not relevant and should not be included.

The SEAS makes a number of comments, including:

- the *Analysis Report* is very technical, making it difficult for a layperson to understand or have their suggestions taken seriously.
- requests for increased biodiversity protection are ignored because data does not meet the standards of the Forest Service.
- greater emphasis must be placed on ecosystem changes in doing sensitivity analyses, and perhaps an independent body should do these.
- there is too much reliance on unproven innovative forest practices.
- individuals should be named in the *Summary of Public Input* as well as companies and organizations.
- full submissions should be presented to the chief forester, not summaries.

Harvest Levels

The City of Merritt requests an increase in the AAC or, if that is not possible, at least continuation of the current level. Forestry is a major component of the economic life of this community, according to the City's submission.

The SEAS says implementation of the Forest Practices Code should have reduced the AAC, and they suspect this has been compensated for by including previously inoperable areas. The society says the proposed softwood lumber tariff may require a review of every AAC in the province, and a reduction may be necessary to prevent companies from being penalized for undercutting. This emphasizes the failing of a volume-based industry, according to the SEAS submission.

Appendix 1

Submissions received by the Merritt Forest District

Submissions received on the Data Package

Forest industry

Joint submission from Ardew Wood Products, Aspen Planers, Tolko Industries and Weyerhaeuser Canada

Government agency

Ministry of Environment, Lands and Parks; Alison Chutter, Forest Ecosystem Specialist

Submissions received on the Timber Supply Analysis Report

Forest industry

Joint submission from Ardew Wood Products, Aspen Planers, Riverside Forest Products, Tolko Industries and Weyerhaeuser Canada

Local government

City of Merritt

Interest groups

Shuswap Environmental Action Society; Bert Parke, director

Government agencies

Department of Fisheries and Oceans – Habitat Enhancement Branch; Gordon Kosakoski

Ministry of Environment, Lands and Parks; Brian Harris, Forest Ecosystem Specialist